

1 Darius F. Rafie, Esq.
2 Nevada Bar No. 6465
3 **MORTENSON & RAFIE, LLP**
4 10781 W. Twain Avenue
5 Las Vegas, NV 89135
6 Ph: 702-363-4190
7 Fx: 702-363-4107
8 Email: manager@nvlaw.us
9 *Attorney for Pro-Point, Inc., d/b/a*
10 *Go Clean Chemical, Marsh And*
11 *Marsh, LLC, Richard Marsh,*
12 *Lynne Marsh, And Shawn Marsh*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 ECOLAB, USA, INC.,

12 Plaintiff,

13 vs.

14 PRO-POINT, INC., D/B/A GO CLEAN
15 CHEMICAL, MARSH AND MARSH, LLC,
16 RICHARD MARSH, LYNNE MARSH, AND
17 SHAWN MARSH,

18 Defendants.

Case No.: 2:23-cv-02097-CDS-EJY

**STIPULATION AND ORDER
EXTENDING TIME FOR
DEFENDANT'S RESPONSE TO
COMPLAINT
(First Request)**

19 DEFENDANTS PRO-POINT, INC., D/B/A GO CLEAN CHEMICAL, MARSH AND
20 MARSH, LLC, RICHARD MARSH, LYNNE MARSH, AND SHAWN MARSH
21 ("Defendants"), by and through their attorneys, the law firm of MORTENSON & RAFIE, LLP,
22 and PLAINTIFF ECOLAB USA, INC., by and through its attorneys, the law firms of Merchant
23 & Gould P.C. and Lewis Roca Rothgerber Christie LLP, hereby stipulate and agree to extend
24 the date for Defendants' Response to Plaintiff's complaint for thirty (30) days.
25

26 Defendants were served on January 2, 2024. The last day to respond to Plaintiff's
27 Complaint (Ecf. No.1) is January 23, 2024.
28

MORTENSON & RAFIE, LLP
10781 West Twain Avenue
Las Vegas, Nevada 89135
Telephone (702) 363-4190 Facsimile (702) 363-4107

The parties need more time in an attempt to reach a resolution of the case. The parties hereby stipulate and agree to extend the date of response to February 22, 2024.

DATED this 23 day of January, 2024.

DATED this 23 day of January, 2024.

MORTENSON & RAFIE, LLP

**LEWIS ROCA ROTHGERBER CHRISTIE
LLP**

/s/ Darius F. Rafie

/s/ Meng Zhong

Darius F. Rafie, Esq.
Nevada Bar No. 6465
10781 W. Twain Avenue
Las Vegas, NV 89135
Ph: 702-363-4190
Fx: 702-363-4107
Email: manager@nvlaw.us
*Attorney for Pro-Point, Inc., d/b/a
Go Clean Chemical, Marsh And
Marsh, LLC, Richard Marsh,
Lynne Marsh, And Shawn Marsh*

Meng Zhong
Nevada Bar No. 12145
3993 Howard Hughes Pkwy., Ste. 600
Las Vegas, NV 89169
Ph: 702-949-8200
mzhong@lewisroca.com

Scott W. Johnston
MERCHANT & GOULD P.C.
150 South Fifth St., Ste. 2200
Minneapolis, MN 55402
Ph: 612-332-5300
sjohnston@merchantgould.com

Attorneys for Ecolab USA Inc.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: January 23, 2024

MORTENSON & RAFIE, LLP

10781 West Twain Avenue
Las Vegas, Nevada 89135
Telephone (702) 363-4190 Facsimile (702) 363-4107